

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

10 TANKER AIR CARRIER, LLC

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

No. 21-1084 C

MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiff 10 Tanker Air Carrier, LLC (“10 Tanker”), respectfully requests that this Court file under seal 10 Tanker’s Complaint and its attached documents. The Complaint contains protected information that was subject to a protective order during the GAO bid protest related to this procurement (Docket No. B-418636.5 *et al.*). 10 Tanker is simultaneously filing a Motion for Entry of a Protective Order. 10 Tanker is also filing under seal a proposed redacted version of the Complaint because, pursuant to the GAO protective order, the parties must agree on redactions of all documents containing protected information before the public version is finalized. 10 Tanker requests that this proposed redacted version also be filed under seal.

March 19, 2021

Respectfully submitted,

s/ James G. Peyster

James G. Peyster

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